

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13
:
Jeanette L. DelValle : No. 21-10448-AMC
Debtor :

ANSWER TO MOTION OF MANUFACTURERS AND TRADERS TRUST COMPANY ALSO
KNOWN AS M&T BANK SUCCESSOR BY MERGER TO HUDSON CITY SAVINGS
BANK, FSB FOR RELIEF FROM THE AUTOMATIC STAY UNDER SECTION 362
AND CERTIFICATE OF SERVICE

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Denied.
7. Denied.
8. Denied. Debtor alleges she has not missed any payments. Bank of America is paid every month.
9. Denied.
10. Admitted.
11. Admitted.
12. Debtor has paid all payments.
13.
 - a. Denied.
 - b. Denied.

WHEREFORE Debtor respectfully requests this Honorable Court deny Movant's Motion for Relief.

/s/ David M. Offen
David M. Offen
Attorney for Debtor

Dated: 08/29/2022

A copy of this Answer is being served on Rebecca A. Solarz, Esquire, and the Chapter 13 Trustee.